

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

CLINGMAN & HANGER  
MANAGEMENT ASSOCIATES, LLC,  
as Trustee of the Furie Litigation Trust,  
Plaintiff,

vs.

KAY RIECK et al.,  
Defendants.

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Civil Action No. 4:21-cv-02698  
Jury

**DEFENDANT THOMAS E. HORD'S UNOPPOSED  
MOTION FOR EXTENSION OF TIME TO FILE ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

1. Defendant Thomas E. Hord respectfully requests an extension of time to file his answer to Plaintiff's Second Amended Complaint (ECF No. 288).
2. Plaintiff, Clingman & Hanger Management Associates, LLC, filed its Second Amended Complaint on April 18, 2024 (ECF No. 288).
3. Under the Court's Procedures, Plaintiff's reply is due on May 2, 2024, because this is the fourteenth day after service of the Second Amended Complaint.
4. Defendant Hord is requesting an extension of time to May 23, 2024.
5. The nature of the legal issues raised in the response requires additional time for legal research. Further, Defendant Hord and defense counsel have not able to meet in person concerning the facts raised in the complaint. Finally, defense counsel, will be celebrating his 40<sup>th</sup> wedding anniversary and 70<sup>th</sup> birthday out of State which will cheerfully occupy his attention and requires additional time to answer the complaint.
6. As indicated in the Certificate of Conference below, Plaintiff, Clingman & Hanger

Management Associates, LLC, is not opposed to this requested extension of time; Defendant Hord has always agreed to Plaintiff's requested extensions in the past.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Defendant, Thomas E. Hord, prays that the Court extend the time for him to file his answer (ECF No. 288) to May 23, 2024.

Respectfully submitted,

HILL & HILL P.C.

/s/ J. Marcus "Marc" Hill

J. MARCUS HILL

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**ATTORNEY FOR  
DEFENDANT  
THOMAS E. HORD**

**CERTIFICATE OF CONFERENCE**

On April 30, 2024 and May 1st, 2024, the undersigned corresponded with Robert Corn, counsel for Plaintiff, regarding this Motion. Counsel responded that Plaintiff is unopposed to the extension of time requested in this Motion.

/ s/ J. Marcus "Marc" Hill

J. Marcus Hill

**CERTIFICATE OF COMPLIANCE**

Under the Court's Procedures, I certify that this motion contains 221 words, except the excluded case caption, signature block, and certificates. It was prepared in Microsoft Word using 13-point typeface. In making this certificate of compliance, I am relying on the word count provided by the software used to prepare the document.

/ s/ J. Marcus "Marc" Hill

J. Marcus Hill

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the above and foregoing instrument has been sent to all parties via electronic filing and service on the 1<sup>st</sup> day of May 2024 in accordance with the Federal Rules of Civil Procedure.

/ s/ J. Marcus "Marc" Hill

J. Marcus Hill